

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Bay State Gas Company

D.T.E. 05-27

**ATTORNEY GENERAL'S MOTION FOR ENTRY UPON PROPERTY AND
INSPECTION**

Pursuant to 220 C.M.R. § 1.06(7) and G. L. c. 30A, §11, the Attorney General moves for leave for entry and inspection of the property of the Bay State Gas Company (“Bay State” or “Company”). The Company has submitted a depreciation study prepared by Mr. Robinson, and on June 8, 2005, the Attorney General designated his own depreciation witness. The Attorney General requests leave for entry and inspection so that his witness will have an opportunity directly to review the same physical evidence that the Company provided to Mr. Robinson for examination. The Attorney General has twice asked Bay State to provide details of this material, AG 5-4 and AG 8-24, but the Company has failed to respond. As a result, the Attorney General is unable at this time to describe the property location in detail or fix a date certain for inspection. Permitting entry and inspection will allow the Attorney General to develop rebuttal evidence to the positions taken by the Company on depreciation.

WHEREFORE: The Attorney General request leave to enter property of the Company and conduct inspections.

Respectfully Submitted,

THOMAS F. REILLY

By: _____

Alexander J. Cochis
Assistant Attorney General
Utilities Division
One Ashburton Place,
Boston, MA 02108 - 1598
(p) (617) 727-2200 ext. 2406
(f) (617) 727- 1047

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